

# Lowenstein Sandler LLP

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April 29, 2014

## VIA ECF

Honorable Katherine S. Hayden, U.S.D.J.  
United States District Court  
United States Post Office & Courthouse  
1 Federal Square  
Newark, NJ 07102

Honorable Mark Falk, U.S.M.J.  
United States District Court  
United States Post Office & Courthouse  
1 Federal Square  
Newark, NJ 07102

**Re: NXIVM v. The Ross Institute, et al.; Docket No. 06-cv-01051 (KSH) (MF)**

Dear Judges Hayden and Falk:

I write in response to Mr. McGuire's letter of April 28, 2014 [Docket #550], and to join Mr. Falzone's request [Docket #552] that Mr. McGuire's request be denied as entirely lacking in merit.

As an initial matter, I hereby represent that neither I nor Lowenstein Sandler has received a single document or other type of "NXIVM materials" from Ms. Keeffe. In my application to the Court seeking to withdraw my client, Rick Ross's claim against Ms. Keeffe, I quoted from what I believe to be her communication with Mr. Crockett alleging "continuing ongoing criminal conduct," and that she is "cooperating with the authorities." *See* Docket 548, at 3. Mr. McGuire expresses NXIVM's concern that the Court "lose jurisdiction over Ms. Keeffe" and "NXIVM materials." But any criminality that Ms. Keeffe threatens to expose, and any evidence of that criminality she may possess, are not matters for this Court. Any disputes on those issues, underscored by the contrasting positions of Mr. McGuire on behalf of NXIVM and Mr. Falzone on behalf of Ms. Keeffe, is between those parties.

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Respectfully submitted,

/s/ Peter L. Skolnik

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cc: All Counsel via ECF